

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 25-10597

EGYPT HOUSE,)
Plaintiff,)
)
VS:)
)
JOHN P. KELLY, as an Individual and in his capacity as)
Chairman of the Board of Assessors, WILLIAM J. WILLIS as an)
Individual and in his capacity as Member of the Board of)
Assessors, JONATHAN LEDERMAN, as an Individual and in his)
capacity as Member of the Board of Assessors, TODD LARAMIE,)
as an Individual and in his capacity as Assistant Assessor,)
KAREN D. BERTOLINO, as an Individual and former Assistant)
Assessor, MICHAEL TUMULTY, as an Individual, in his capacity)
as Assistant Assessor (ret.), and Consultant to the Town of)
Marblehead, DOUGLAS E. PERCY, as an Individual and in his)
Capacity as Member of the Board of Assessors, BOARD OF)
ASSESSORS, TOWN OF MARBLEHEAD, the TOWN OF)
MARBLEHEAD, a Massachusetts Township, THATCHER W.)
KEZER, III, as an Individual and in his capacity as Town)
Administrator, LISA MEAD, as an Individual and in her capacity)
as Town Counsel, ADAM J. COSTA of Mead, Talerman, & Costa,)
LLC, as an Individual and in his capacity as counsel to the Town)
of Marblehead, MATTHEW D. PROVENCHER of Mead,)
Talerman & Costa, LLC, as an Individual and in his capacity as)
counsel to the Town of Marblehead)
)
Defendants)

TOWN DEFENDANTS' NOTICE TO COURT REGARDING POSITION ON
INSPECTION PHOTOGRAPHS

The Defendants, John P. Kelly, William J. Willis, Jonathan Lederman, Todd Laramie, Karen D. Bertolino, Michael Tumulty, Douglas E. Percy, Town of Marblehead Board of Assessors, Town of Marblehead and Thatcher W. Kezer, III, (hereinafter "Town Defendants") respond as follows to the Court's inquiry from the November 3, 2025 hearing on Plaintiff's Emergency Motion for Temporary Restraining Order and Preliminary Injunction (Doc. 115)

regarding the Town's position on retention of the two subject photographs from the July 23, 2025 inspection of Egypt House:

The Town Defendants respectfully request additional time from the Court to respond to its inquiry because the Town of Marblehead's Board of Assessors must make a decision regarding the inquiry together. This decision-making process requires scheduling a meeting and discussion at an executive session. 48 hours of public notice are required for such meetings. As such, the earliest the Board of Assessors could possibly render a decision regarding the Court's inquiry would be on Thursday, November 6, 2025. Given this, the Town Defendants respectfully request until November 10, 2025, to respond to the Court's inquiry.

In addition to this request, the Town Defendants note the photograph, attached to this notice as Exhibit A, as it may be relevant to the Court's consideration of the Plaintiff's motion. The photograph is a screenshot of a video interview Andrew Bushell gave on Fox News. The interview appears to be in the same room where the inspection photographs were taken, although there is no covering of seemingly holy objects in Fr. Bushell's video interview. This interview is publicly available at the hyperlink captured in the screenshot.

Respectfully submitted,

Defendants, John P. Kelly, William J. Willis,
Jonathan Lederman, Todd Laramie, Karen D.
Bertolino, Michael Tumulty, Douglas E. Percy,
Town of Marblehead Board of Assessors, Town of
Marblehead and Thatcher W. Kezer, III,
By their attorneys,

/s/ Leonard H. Kesten

Leonard H. Kesten, BBO# 542042

Nina Bonelli, BBO #698709

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CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will therefore be sent electronically to the registered participants as identified on the Notice of Electric Filing (NEF) and paper copies will be sent to those participants indicated as non-registered participants.

/s/ Leonard H. Kesten
Leonard H. Kesten, BBO# 542042

Dated: November 3, 2025

EXHIBIT A

foxnews.com/video/6347780386112



America Reports March 03, 2024 · 06:27 · CLIP

Christian monk details arrest by FBI for charges that have since been dropped